



File Code: 2230; 2210
Date: April 12, 2021

Marcus Bunn
Centennial Livestock
PO Box 157
Bridgeport, CA
93517

Dear Marcus,

The following letter will document the phone meeting between Marcus Bunn and Aaron Coogan on April 22nd, 2021 and will serve as your Annual Operating Instructions (AOI) for the 2021 grazing season on the Robinson Creek Allotment.

Permitted # of Livestock

Allotment	Number	Kind/Class	Season	Head Months
Robinson Creek C&H	3 on / 197 off	Cow/Calf	6/1 – 10/15	14 on / 887 off

Authorized # of Livestock

Allotment	Number	Kind/Class	Season	Head Months
Robinson Creek C&H	3 on / 197 off	Cow/Calf	6/1-10/15	14 on / 887 off

Utilization Standards:

Please review the following utilization standards prior to turning out as the use level states it the maximum utilization allowed for the planned season of use. Once these levels have been reached, you will be required to move your livestock to another unit or remove them from National Forest System lands regardless of the time remaining in the grazing season or how many head months you have paid for. You are responsible for tracking and complying with your permitted forage use levels.

The allowable use of forage is based on current year's growth of key species. The standards and guides of the Sierra Nevada Forest Plan Amendment are listed in your Term Grazing Permit.

Riparian Sites:

Disturbance of meadow associate streambanks and natural lake and pond shorelines is not to exceed 20% of the stream reach of 20% of the natural lake or pond shoreline.

In meadows that are in early seral status (an early stage of plant succession in a plant community or vegetation type, generally characterized by plant species that are adapted to colonizing



disturbed areas with a high proportion of bare soil) livestock utilization of grass and grass-like plants must be limited to 30% (or minimum six-inch stubble height).

In meadows that are in late seral status (50% or more of the relative cover of the herbaceous layer is late seral with high similarity to the potential natural community, a diversity of age classes of hardwood shrubs is present, and regeneration is occurring) livestock utilization of grass and grass-like plants must be limited to a maximum of 30% (or minimum four-inch stubble height).

In meadows that are degraded (such as those in early seral status with a greater than 10% meadow area in bare soil and active erosion) total rest from grazing is required until they have recovered and have moved to a mid or late seral status.

In riparian areas browsing on mature riparian shrubs (including willow and aspen) is not to exceed 20% of the annual leader growth and is not to exceed more than 20% of individual seedlings.

Livestock grazing will be modified or suspended on meadow ecosystems when it is determined that ecological status is moving in a downward trend.

Pesticide application to livestock is prohibited within riparian conservation and critical aquatic refuge areas.

Upland and Aspen Plant Communities:

Utilization is not to exceed 45% on grass, grass-like and forbs, and 40% on shrubs.

Compliance:

Livestock Brands/Identifiers – Only livestock marked, tagged, or branded as shown in the application upon which this permit is based, and as may be required under Section 8(f), will be allowed to graze under this permit unless the permittee has advance written approval from the Forest Officer in charge to do otherwise. Brand(s) permitted on the Robinson Creek C&H Allotment are:

The W over L brand

AOI is Part of Grazing Permit – These Annual Operating Instructions supplement and become a part of your Term Grazing Permit, as provided for in Part 2, Clause 8(a). Your compliance with this instruction is essential for the proper management of National Forest System lands. Failure to comply with the terms and conditions of your permit and this instruction will result in permit action which can include suspension or cancellation of part or all of your Term Grazing Permit.

Modifying AOI – Situations may develop during the grazing season which requires changes to these instructions. If this becomes necessary, or if you cannot comply with some parts of these instructions, contact the District Ranger and obtain approval before initiating changes or deviating from these instructions.

Notice of Non-compliance Actions – Non-compliance is any violation of the terms and conditions identified in the Term Grazing Permit as well as the current seasons AOI. Administrative action such as partial or total suspension or cancellation of grazing privileges can occur when non-

compliance is habitual or where immediate action is necessary to protect public health, interest, or safety. If an occurrence of non-compliance is identified, a Notice of Non-compliance (NONC) will be sent that identifies specific permit violations, what corrective actions should be taken, a timeframe to complete the corrective actions, and possible administrative actions that may be taken if violations are not remedied.

Livestock Requirements:

Counting – When requested by the Forest Officer, the permittee will, at any time during the permitted period of use, including entry and removal dates, gather permitted livestock to enable an accurate count to be made. The Forest Service may, at its option, gather and hold for counting all livestock grazing on the allotment. It is the permittees' responsibility to notify the Forest Officer a minimum of five days before turnout of when and where livestock will be turned out so a count can be made if desired.

Certified Weed Free Hay – By USDA order 04-00-097, all non-pelletized hay, straw or mulch possessed, stored, or transported on National Forest System Lands, in individual bales or containers, must be tagged or marked as noxious weed free, or must have the original and current evidence of noxious weed free certification documentation present. All markings must meet the State and/or county standards for certification as noxious weed free. If the animals are being fed hay prior to coming on to the National Forest, please see to it that they are fed weed free hay for several days before turn out to allow the majority of seeds to pass. It is your responsibility to ensure that your livestock do not contribute to the transport of noxious weeds on the allotment. Any hay, straw, or other feeds used on the allotment either shall be certified as being free of noxious weeds, or shall consist of heat treated pelletized feed.

Entering Allotment – You will need to contact the Forest Officer at least five days prior to your turn on date to confirm that the rangeland is ready, and that required maintenance is complete. The actual on date will be based on a general range readiness check and as time permits, spot-checks of maintenance.

Pasture Movements and Exiting Allotment – The Forest Service recognizes that moves from one pasture to another cannot usually be accomplished in one day. It is your responsibility to begin early movements of livestock to ensure that pastures are clean by the dates specified. Early movement shall not exceed five days unless approved in advance by the Forest Officer.

Depending on the pasture, the permittee should spend as much time as needed in moving livestock away from areas of concern (meadows, riparian areas, key areas, and so forth) and into areas of normally light use. This is entirely to the benefit of the permittee as it allows the livestock to make use of forage that otherwise will not be grazed before allowable use standards are met in the key areas and the livestock are required to be removed from the pasture.

Permittees are encouraged to employ gentle herding techniques based on slow movement, herding in the afternoon and early evening rather than morning, bedding livestock in the desired area overnight, letting the livestock respond to your movements, rather than pushing them hard, and so forth. This has proven to result in better overall distribution with less stress on the livestock

The off date for a pasture is the date when the livestock are to be fully out of the unit, or in the

case of the last pasture, fully off the National Forest System lands. It is your responsibility to ensure compliance with this requirement. Failure to completely remove livestock from a pasture by the off date may result in action being taken against the grazing permit(s).

General Allotment Management:

Improvements – You are responsible for maintenance of all rangeland improvements assigned to you in your grazing permit, whether grazing occurs or not. All assigned improvements are to be maintained to a level that fully serves the intended purpose and perpetuates the effective life of each improvement. Improvement maintenance and responsibility is adequately described on part 3 of the grazing permit and clearly displays the requirements for completing maintenance prior to turn out of livestock into the area/unit/allotment.

- Exterior Fences- must be maintained to standard prior to the earlier turn on date or either yourself or your neighbor on the adjacent allotment. It is your responsibility to coordinate with your neighbor to ensure that the maintenance occurs on time. All interior fences must be maintained to standard prior to turning livestock against them.
- Water Developments- must be maintained to standard prior to livestock entering the pasture containing the development.

Maintenance must occur throughout the season and cannot be a one-time action. Damage resulting from big game, wind or other acts of nature, or human caused actions, must be repaired in a timely manner to ensure the integrity of the structure. If serious or repeated problems occur, contact the Forest Officer and work to determine long-term solutions. The Forest Service will spot check maintenance as time permits; or if we are made aware of a problem, additional checks will be conducted. Failure to properly complete the assigned maintenance to standard and in a timely manner will be cause for denial of permission either to place livestock on the allotment, or to move to another pasture, and/or may result in action being taken against the grazing permit.

If there are structures that are deteriorating to the point where maintenance is no longer able to adequately repair them, the permittee will work with the Forest Officer to schedule replacement. In general, this work will be completed on an approximately 50:50 cost share basis between the permittee and the Forest Service. Please be aware that it is necessary to plan projects with at least one-year lead-time to allow for the required documentation and clearances. Project work will be performed only under an approved Permit Modification for Cooperative Range Improvement. This agreement will contain and specify the project standards and timeframes.

Salt & Supplement Placement – Salt or supplement can be used to improve distribution of livestock into areas of light use and to lessen grazing impacts to key areas. All salt or supplement will be placed away from key areas and available water, in areas where livestock is usually light. It should be moved progressively to allow animals to find it and to become used to grazing in the vicinity. Animals may also need to be herded to the salt and bedded in the general vicinity. In no case will salt or supplement be placed closer than ¼ mile to streams, springs, water developments, or other wetlands without prior approval of the Forest Officer. Salt or supplement will not be placed within tree regeneration areas where the smallest trees are less than three feet tall. Salt or supplement will not be placed near trailheads, on open roads, in areas of concentrated public use, or in other areas where such placement is liable to result in conflicts with other Forest or Grassland users. Unless otherwise agreed to by the Forest Officer, salt or supplement shall be

removed from a pasture when the livestock are removed.

Noxious & Invasive Weeds – Any equipment used in the transport of livestock, including horse trailers and stock trucks, should be washed before coming onto the allotment, if they have been used in areas where noxious weeds are present. Any seed used on the allotment must be tested by a certified laboratory to AOSA standards and certified to meet State standards based on the All States Noxious Weed list. Your assistance in locating noxious weed sites and reporting them to your Forest Officer is greatly appreciated. If you are able and willing to assist in treating noxious weeds, please work with your Forest Officer to determine how best to help.

Disposal of Dead Livestock – Any dead livestock shall be moved to a location greater than 300 feet from water, out of view of roads or trails, and away from any areas of significant public use.

Travel Management & Access – The Bridgeport Travel Management Record of Decision was signed on March 5, 2010. With the issuance of this decision all roads and trails designated for motor vehicle use have been identified on a Motor Vehicle Use Map (MVUM). As detailed in 36 CFR 261.13; 36 CFR 212.51a the prohibitions on motor vehicle use will not apply to motor vehicle use that is specifically authorized under a written authorization issued under Federal Law or Regulation (e.g., Term Grazing Permit). Through the 2017 grazing season, you and your employees are authorized to travel on routes within your permitted allotment to ensure compliance with the terms and conditions of your permit (e.g., improvement maintenance, dead livestock removal).

Management Requirements:

Nonuse – Nonuse applies only to livestock numbers, not to the season of use. In the absence of approved nonuse, the permittee must place 90% or more of the permitted livestock numbers on the allotment. A permit cannot be waived based on sale of permitted livestock if that permit is in personal convenience nonuse status. Nonuse does not relieve the permittee from range improvements maintenance responsibility. Improvements used in common will be maintained before either operator turns on.

- Personal Convenience Nonuse must be requested in writing, 30 days prior to the permitted on-date. This will provide the Forest Officer sufficient time to review the request and approve/disapprove the application or consent to an alternative resolution. This type of nonuse is only allowed for up to three consecutive years and no more than four years in any 10-year period. Approval of nonuse is not automatic.
- Nonuse for Resource Protection or Development may be implemented by the authorized Forest Officer if necessary, to facilitate the protection or development of National Forest System Lands and Resources.

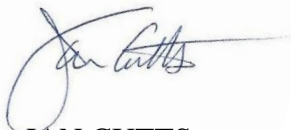
Required Reporting – Included with this AOI are forms for recording your actual use and range improvement maintenance on the allotment. Please complete the forms and return them to my office no later than November 30, 2021. Failure to report actual use and improvement maintenance could result in **NON-COMPLIANCE** actions being taken on your permit.

Billing/Credit – The 2021 grazing fees are set at \$1.35 per head month for cattle. All bills need to be processed through our payment center and confirmed before livestock can enter onto National Forest Service Lands. Livestock remaining on the National Forest after the authorized grazing

season must be billed for at the unauthorized use rate and may be cause for administrative action against the grazing permit. If you are required to delay turnout or leave the allotment early, you may request for a credit against the next years' bill for collection for the unused head months. Actual use records document dates livestock spend within particular pastures or allotments, as well as other useful information such as loss, resource concerns, improvement needs, etc. To be eligible for credit, all credit applications and actual use records need to be received by December 31 of the current grazing season.

If you have any questions or concerns about the management of your permitted allotments, please contact the district range staff: **Aaron Coogan (760) 932-5850** aaron.coogan@usda.gov

Sincerely,

A handwritten signature in dark ink, appearing to read "Jan Cutts", is written over a light gray rectangular background.

JAN CUTTS
District Ranger